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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,)
Plaintiff,)
vs.)
MARIO DAVID SANCHEZ,)
Defendant.)
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2:15-CR-00213-JAD-NJK
**STIPULATION TO CONTINUE
SENTENCING AND DISPOSITION
FOR MARIO D. SANCHEZ**

IT IS HEREBY STIPULATED AND AGREED by and between Defendant, MARIO DAVID SANCHEZ, by and through his counsel, TODD M. LEVENTHAL, ESQ., and the United States of America, by its counsel, SUSAN CUSHMAN, Assistant U.S. Attorney, that the trial in the above-captioned matter currently set for Monday April 3, 2017 at 9:00a.m. be vacated and continued to at least 60 days to a time convenient for the court.

This Stipulation is entered into for the following reasons

1. Mr. Leventhal is in Trial for U.S. vs. Bundy et al., and will not be available for the sentencing hearing.
2. Mr. Sanchez is not in custody and agrees with the requested continuance.
3. Mr Leventhal has spoken to Susan Cushman, Assistant United States Attorney, and she has no objection to this continuance.

1 4. Additionally, denial of this request for a continuance could result in a miscarriage
2 of justice.

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4 DATED this 29TH day of March, 2017.

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6 /s/ Todd M. Leventhal
7 TODD M. LEVENTHAL, ESQ.
Counsel for Mario David Sanchez

6 /s/ Susan Cushman
7 SUSAN CUSHMAN
Assistant U.S. Attorney

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11 Submitted By: LEVENTHAL & ASSOCIATES, PLLC

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13 By: /s/ Todd M. Leventhal
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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

10 UNITED STATES OF AMERICA,) 2:15-cr-00213-JAD-NJK
11 Plaintiff,)
12 vs.)
13 MARIO DAVID SANCHEZ)
14 Defendant.)
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FINDINGS OF FACT

18 Based on the stipulation of counsel, and good cause appearing, the Court finds that:

19 1. Mr. Leventhal is in Trial for U.S. vs. Bundy et al., and will not be available for the
20 sentencing hearing.

21 2. Mr. Sanchez is not in custody and agrees with the requested continuance.

22 3. Mr Leventhal has spoken to Susan Cushman, Assistant United States Attorney, and
23 she has no objection to this continuance.

24 4. Additionally, denial of this request for a continuance could result in a miscarriage
25 of justice.

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CONCLUSIONS OF LAW

1. For all the above-stated reasons, the ends of justice would be best served by granting a continuance of the current Sentencing and Disposition Hearing and reset it for a time after June 29th 2017 at a time convenient for the court.

ORDER

Accordingly, IT IS SO ORDERED that the current Sentencing and Disposition is vacated and the same is continued and reset for June 5, 2017, at the hour of 9:00 a.m.

DATED this 29th day of March, 2017.


JENNIFER A. DORSEY
UNITED STATES DISTRICT JUDGE

CERTIFICATE OF SERVICE

I hereby certify that on the 29th day of March, 2017 a true and correct copy of the,

STIPULATION AND ORDER TO CONTINUE TIME FOR SENTENCING AND

DISPOSITION was filed through the CM/ECF filing system and was electronically served to the following registered addresses on file for this instant case :

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/s/ Todd M. Leventhal
An Employee of TODD M. LEVENTHAL, ESQ.
LEVENTHAL AND ASSOCIATES, PLLC.